

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of

PHILIPPE MARTINEZ and MSR MEDIA SKN,
LTD.,

Applicants for an order Pursuant to 28 U.S.C. §
1782 to Conduct Discovery for Use in a Foreign
Proceeding.

MISCELLANEOUS ACTION NO.
1:24-mc-00306 (RA)

**DECLARATION OF ERIC BRESLIN IN SUPPORT OF TIMOTHY HARRIS'
OPPOSITION TO PETITIONERS' APPLICATION FOR DISCOVERY**

I, Eric R. Breslin, declare:

1. I am a partner with the law firm of Duane Morris LLP, counsel for Timothy Harris.

2. Attached as Exhibit A is the Declaration of Amanda Mellor filed on May 1, 2020 in the action *Knight v. Standard Chartered Bank, et al.*, No 19-cv-11739 (PAE) (S.D.N.Y. June 16, 2020) (ECF No. 17).

3. Attached as Exhibit B is the Order and Opinion filed on July 23, 2024 in the action *In re Application for Authorization to Conduct Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782*, No. 24-cv-20492 (S.D. Fla.) (ECF No. 42).

New York, New York
September 4, 2024

/s/ Eric R. Breslin
Eric R. Breslin